

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2019-195-E**

IN RE: South Carolina Energy Freedom Act)
 (House Bill 3659) Proceeding Related to)
 Duke Energy Carolinas, LLC for the)
 Commission to Establish Reasonable)
 Guidelines to Ensure Reasonable)
 Interconnection Timelines, Including)
 Time Requirements to Deliver a Final)
 System Impact Study to All)
 Interconnection Customers that Execute)
 a System Impact Study Agreement - S.C.)
 Code Ann. Section 58-27-460-(D))
)

**PETITION
TO
INTERVENE**

This Commission established Commission Docket 2019-195-E, on June 4, 2019, for this Commission to establish reasonable guidelines, related to Duke Energy Carolinas, LLC, (“DEC”, of the, “Company”) to ensure reasonable interconnection timelines, including time requirements to deliver a final system impact study to all interconnection customers that execute a System Impact Study Agreement, pursuant to S.C. Code Ann., Section 58-27-460(D).

Petitioner herein is South Carolina Solar Business Alliance, Inc., (“SCSBA” or “Petitioner”). This Petition to Intervene is filed pursuant to R. 103-825, of this Commission’s Rules and Regulations and other applicable Rules and Regulations of this Commission, and Petitioner seeks permission to intervene and be made a party of record in the above-referenced Docket, with full rights of participation.

1. SCSBA is a Public Benefit Non-Profit Corporation, by a conversion filing on May 17, 2017, with the South Carolina Secretary of State’s office, originally organized on October 21, 2009, pursuant to Chapter 44 of Title 33 of the South Carolina Code of Laws and, since that date, remaining in good standing with the South Carolina Secretary of State.

2. SCSBA's principal place of business is currently co-located with that of Southern Current LLC at 1519 King Street Extension, Charleston, South Carolina 29405 and SCSBA’s mailing address is currently co-located with that of the Hannah Solar Government Services, LLC at 1090 Jack Primus Road, Charleston, South Carolina, 29492.

3. SCSBA is organized for the purpose of promoting and advocating public policy positions supportive of solar power generation in South Carolina.

4. SCSBA is a Public Benefit Non-Profit Corporation, whose Board Members are the following individuals, all of whom conduct solar energy-related business in South Carolina under the company names indicated:

- a. Bret Sowers (Southern Current LLC);
- b. Jarrett Branham (Alder Energy Systems, LLC);
- c. Johnny Bagley (Hannah Solar Government Services, LLC);
- d. Andrew Berrier (Pine Gate Renewables);
- e. Steffanie Dohn (Southern Current LLC);
- f. Tyson Grinstead (Sunrun Inc.); and
- g. Tyler Norris (Cypress Creek Renewables).

5. Petitioner, SCSBA's Trade Members includes solar energy developers, engineering procurement and construction, contractors, professional service firms, equipment distributors and equipment manufacturers engaged in the business of solar energy generation in South Carolina and across the nation. A majority of Petitioner, SCSBA's Board Members' companies maintain offices in South Carolina.

6. Therefore, SCSBA is financially impacted by this Commission's decisions to be made in this Docket.

7. Specifically, the grounds for the Petition are that Petitioner, SCSBA's Trade Members conduct business with DEC and Petitioner, SCSBA has a material interest in the subject matter of this Docket.

8. This Commission is establishing reasonable guidelines related to DEC, to ensure reasonable interconnection timelines, including time requirements to deliver a final system impact study to all interconnection customers that execute a System Impact Study Agreement, pursuant to S.C. Code Ann. Section 58-27-460(D).

11. As outlined hereinabove, Petitioner, SCSBA has substantial business interests in DEC's assigned territory in South Carolina.

12. Petitioner's position is that Petitioner, SCSBA and its Trade Members are interested parties and have a direct and substantial interest in the decisions to be made by this Commission in this Docket and Petitioner's interests cannot be adequately addressed by any other party. Petitioner's further position is that Petitioner, SCSBA will be impacted by this Commission's decisions upon its review, outlined hereinabove. Therefore, the decisions of this Commission is important to the Petitioner and its Trade Members from a financial standpoint. Petitioner's further position is that Petitioner's Intervention will aid this Commission, by assisting in the development of a full and fair record to address the important decisions to be made in this Docket.

13. Petitioner should be allowed to intervene in this Docket, with full rights of cross-examination, discovery and participation in any Hearing to be scheduled in this Docket.

14. The granting of SCSBA's Petition to Intervene is (i) in the public interest and (ii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed.

15. This Petition to Intervene is timely filed with this Commission.

16. Petitioner, SCSBA has previously received approval for intervention from this Commission on numerous occasions, including Commission Docket 2015-362-E, Docket 2015-8-E, Docket 2016-2-E, Docket 2016-1-E, Docket 2016-3-E, Docket 2016-9-E, Docket 2016-8-E, Docket 2016-10-E, Docket 2017-2-E, Docket 2017-1-E, Docket 2017-3-E, Docket 2017-305-E, Docket 2017-370-E, Docket 2018-2-E, Docket 2018-3-E, Docket 2018-202-E, Docket 2018-320-E, Docket 2018-10-E, Docket 2018-318-E, Docket 2018-319-E, Docket 2019-2-E; Docket 1995-1192-E, Docket 2019-9-E and Docket 2019-1-E.

17. Furthermore, Petitioner's Intervention is consistent with this Commission's long standing policy, "...in encouraging maximum public participation in issues before this Commission, and [Intervention] should be allowed so that a full and complete record... can be developed." (Order No.: 2005-725, in Docket No.: 2005-270-G, dated December 16, 2005).

18. Petitioner, SCSBA is represented by counsel in this proceeding:

Richard L. Whitt,
AUSTIN & ROGERS, P.A.
508 Hampton Street, Suite 203
Columbia, South Carolina 29201
Telephone: (803) 251-7442
Facsimile: (803) 252-3679
RLWhitt@AustinRogersPA.com

WHEREFORE, Petitioner prays for the following relief:

- (a) That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- (b) That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- (c) For such other and further relief as this Commission deems just and proper.

Respectfully Submitted,
/s/Richard L. Whitt
AUSTIN & ROGERS, P.A.
508 Hampton Street, Suite 203
Columbia South Carolina, 29201
(803) 251-4442
Counsel for Petitioner, South Carolina Solar
Business Alliance, Inc.

June 14, 2019
Columbia, South Carolina